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U.S. DISTRICT COURT  
DISTRICT OF MASS.

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and On Behalf)	Civil Action No. 04-CV-10294-DPW
of All Others Similarly Situated,	)
	)
Plaintiff,	)
	)
vs.	)
	)
SONUS NETWORKS, INC., et al.,	)
	)
Defendants.	)
	)
_____	)
MICHELLE TREBITSCH, On Behalf of	Civil Action No. 04-CV-10307-DPW
Herself and All Others Similarly Situated,	)
	)
Plaintiff,	)
	)
vs.	)
	)
SONUS NETWORKS, INC., et al.,	)
	)
Defendants.	)
	)
_____	)

[Caption continued on following page.]

GLOBAL UNDERVALUED SECURITIES MASTER FUND'S NOTICE OF MOTION AND  
MOTION TO BE APPOINTED LEAD PLAINTIFF PURSUANT TO §21D(A)(3)(B) OF THE  
SECURITIES EXCHANGE ACT OF 1934 AND FOR APPOINTMENT OF LEAD COUNSEL

INFORMATION DYNAMICS, LLC, On  
Behalf of Itself and All Others Similarly  
Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

PETER KALTMAN, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

**Defendants.**

SAMANTHA DEN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10308-DPW

CLASS ACTION

Civil Action No. 04-CV-10309-DPW

CLASS ACTION

Civil Action No. 04-CV-10310-DPW

CLASS ACTION

[Caption continued on following page.]

RICHARD CURTIS, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10314-MLW  
)  
)

) CLASS ACTION  
)  
)

\_\_\_\_\_  
RONALD KASSOVER, On Behalf of the  
Ronald Kassover IRA and All Others Similarly  
Situating,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10329-DPW  
)  
)

) CLASS ACTION  
)  
)

\_\_\_\_\_  
STEVE L. BAKER, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10333-DPW  
)  
)

) CLASS ACTION  
)  
)

\_\_\_\_\_  
[Caption continued on following page.]

MICHAEL KAFFEE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10345-DPW

) CLASS ACTION

HAIMING HU, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10346-DPW

) CLASS ACTION

CHARLES STARBUCK, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10362-DPW

) CLASS ACTION

[Caption continued on following page.]

SAMUEL HO, Individually and On Behalf of ) Civil Action No. 04-CV-10363-DPW  
All Others Similarly Situated, )  
 ) CLASS ACTION  
Plaintiff, )

vs. )

SONUS NETWORKS, INC., et al., )  
 )  
Defendants. )

JEFFREY C. RODRIGUES, Individually and ) Civil Action No. 04-CV-10364-DPW  
On Behalf of All Others Similarly Situated, )  
 ) CLASS ACTION  
Plaintiff, )

vs. )

SONUS NETWORKS, INC., et al., )  
 )  
Defendants. )

ROBERT CONTE and MARK RESPLER, ) Civil Action No. 04-CV-10382-DPW  
Themselves and On Behalf of All Others )  
Similarly Situated, ) CLASS ACTION

Plaintiffs, )

vs. )

SONUS NETWORKS, INC., et al., )  
 )  
Defendants. )

[Caption continued on following page.]

WHEATON ELECTRICAL SERVICES  
RETIREMENT 401K PROFIT SHARING  
PLAN, On Behalf of Itself and All Others  
Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10383-DPW

) CLASS ACTION

\_\_\_\_\_  
BRIAN CLARK, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10454-DPW

) CLASS ACTION

\_\_\_\_\_  
SHEILA BROWNELL, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10597-DPW

) CLASS ACTION

\_\_\_\_\_  
[Caption continued on following page.]

SAVERIO PUGLIESE, On Behalf of Himself )	Civil Action No. 04-CV-10612-DPW
and All Others Similarly Situated, )	
Plaintiff, )	<u>CLASS ACTION</u>
vs. )	
SONUS NETWORKS, INC., et al., )	
Defendants. )	
<hr/>	
DAVID V. NOCITO, On Behalf of Himself )	Civil Action No. 04-CV-10623-DPW
and All Others Similarly Situated, )	
Plaintiff, )	<u>CLASS ACTION</u>
vs. )	
SONUS NETWORKS, INC., et al., )	
Defendants. )	
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PLEASE TAKE NOTICE that the Global Undervalued Securities Master Fund ("Movant"), which purchased the common stock of Sonus Networks, Inc. ("Sonus" or the "Company") between April 9, 2003 and February 12, 2004 (the "Class Period"), hereby moves this Court for an order granting its Motion to Be Appointed Lead Plaintiff Pursuant to §21D(a)(3)(B) of the Securities Exchange Act of 1934 and for Appointment of Lead Counsel ("Motion").

This Motion is brought pursuant to §21D of the Securities Exchange Act of 1934 ("Exchange Act") and on the grounds that Movant has timely filed the instant motion and is the "most adequate plaintiff." In addition, Movant seeks the Court's approval of its selection of Darren J. Robbins and Travis E. Downs III of the law firm of Milberg Weiss Bershad Hynes & Lerach LLP as Lead Counsel and Melick, Porter & Shea LLP as Liaison Counsel for the class pursuant to §21D(a)(3)(B)(iv), 15 U.S.C. §78u-4(a)(3)(B)(iv).

This Motion is based upon this notice of motion, the accompanying memorandum in support thereof, the affidavit of John E. DeWick, the pleadings and other files and records in each of these actions, and such other written or oral argument as may be permitted by the Court at the hearing on this motion.<sup>1</sup>

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<sup>1</sup> Local Rule 7.1(a)(2) requires a conference of counsel prior to filing motions. Movant respectfully submits that this conferral requirement is unnecessary in the context of motions for lead plaintiff since movants have no way of knowing which other entities plan to move for appointment as lead plaintiff until after they have filed their motions. In addition, Local Rule 7.1(a)(2) may be inapplicable to motions for selection of lead plaintiff and approval of lead counsel because such motions are mandated by federal statute. Section 21D of the Exchange Act, as amended by the Private Securities Litigation Reform Act of 1995, sets forth the procedure that must be followed for the selection of lead plaintiff and approval of lead counsel. *See* 15 U.S.C. §§78u-4, *et seq.* Under these circumstances, Movant submits that the conferral requirement of Local Rule 7.1(a)(2) does not apply.



### REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Movant hereby requests oral argument as to this Motion.

DATED: April 12, 2004

MELICK, PORTER & SHEA, LLP  
RICHARD J. SHEA (BBO 456310)  
JOHN E. DeWICK (BBO 654723)

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document  
was served upon the attorney of record for each party by  
mail on 4/12/04

John E. DeWick

John E. DeWick

JOHN E. DeWICK

28 State Street  
Boston, MA 02109  
Telephone: 617/523-6200  
617/523-8130 (fax)

[Proposed] Liaison Counsel

MILBERG WEISS BERSHAD  
HYNES & LERACH LLP  
WILLIAM S. LERACH  
DARREN J. ROBBINS  
TRAVIS E. DOWNS III  
RAMZI ABADOU  
THOMAS E. GLYNN  
401 B Street, Suite 1700  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

[Proposed] Lead Counsel for Plaintiffs

DECLARATION OF SERVICE BY MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is 401 B Street, Suite 1700, San Diego, California 92101.

2. That on April 12, 2004, declarant served the GLOBAL UNDERVALUED SECURITIES MASTER FUND'S NOTICE OF MOTION AND MOTION TO BE APPOINTED LEAD PLAINTIFF PURSUANT TO §21D(A)(3)(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND FOR APPOINTMENT OF LEAD COUNSEL by depositing a true copy thereof in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of April, 2004, at San Diego, California.

  
SHARON E. FORD

SONUS NETWORKS-CA

Service List - 4/6/2004 (04-0069)

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**Counsel For Defendant(s)**

John R. Baraniak, Jr.  
Robert S. Frank, Jr.  
Choate, Hall & Stewart  
53 State Street, Exchange Place  
Boston, MA 02109-2891  
617/248-5000  
617/248-4000(Fax)

James W. Prendergast  
Jeffrey B. Rudman  
Daniel W. Halston  
Hale And Dorr  
60 State Street  
Boston, MA 02109  
617/526-6000  
617/526-5000(Fax)

Thomas J. Dougherty  
Matthew J. Matule  
Skadden, Arps, Slate, Meagher & Flom LLP  
One Beacon Street  
Boston, MA 02108  
617/573-4800  
617/573-4822(Fax)

**Counsel For Plaintiff(s)**

Jeffrey C. Block  
Michael T. Matraia  
Shannon L. Hopkins  
Berman DeValerio Pease Tabacco Burt & Pucillo  
One Liberty Square  
Boston, MA 02109  
617/542-8300  
617/542-1194(Fax)

Evan J. Smith  
Brodsky & Smith, LLC  
333 E. City Avenue, Suite 602  
Bala Cynwyd, PA 19004  
610/667-6200  
610/667-9029(Fax)

Samuel H. Rudman  
David A. Rosenfeld  
Mario Alba, Jr.  
Cauley Geller Bowman & Rudman, LLP  
200 Broadhollow Road, Suite 406  
Melville, NY 11747  
631/367-7100  
631/367-1173(Fax)

Steven J. Toll  
Daniel S. Sommers  
Julie Goldsmith  
Cohen, Milstein, Hausfeld & Toll, P.L.L.C.  
1100 New York Ave., N.W., Suite 500  
Washington, DC 20005-3964  
202/408-4600  
202/408-4699(Fax)

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Page 2 of 5

Jonathan M. Plasse  
Goodkind Labaton Rudoff & Sucharow, LLP  
100 Park Avenue, 12th Floor  
New York, NY 10017-5563  
212/907-0700  
212/818-0477(Fax)

Brian M. Felgoise  
Law Offices of Brian M. Felgoise  
261 Old York Road, Suite 423  
Jenkintown, PA 19046  
215/886-1900

Bruce G. Murphy  
Law Offices of Bruce G. Murphy  
265 Llwyds Lane  
Vero Beach, FL 32963  
772/231-4202  
772/234-0440(Fax)

Charles J. Piven  
Law Offices of Charles J. Piven, P.A.  
The World Trade Center  
401 East Pratt Street, Suite 2525  
Baltimore, MD 21202  
410/332-0030  
410/685-1300(Fax)

Marc S. Henzel  
Law Offices of Marc S. Henzel  
273 Montgomery Avenue, Suite 202  
Bala Cynwyd, PA 19004  
610/660-8000  
610/660-8080(Fax)

Richard J. Vita  
Law Offices of Richard J. Vita  
77 Franklin Street, Suite 300  
Boston, MA 02110  
617/426-6566  
617/357-1612(Fax)

Richard A. Lockridge  
Karen H. Riebel  
Lockridge Grindal Nauen, P.L.L.P.  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
612/339-6900  
612/339-0981(Fax)

Steven G. Schulman  
Richard H. Weiss  
Peter E. Seidman  
Milberg Weiss Bershad Hynes & Lerach LLP  
One Pennsylvania Plaza  
New York, NY 10119  
212/594-5300  
212/868-1229(Fax)

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Page 3 of 5

William S. Lerach  
Travis E. Downs III  
Thomas E Glynn  
Milberg Weiss Bershad Hynes & Lerach LLP  
401 B Street, Suite 1700  
San Diego, CA 92101-4297  
619/231-1058  
619/231-7423(Fax)

Nancy Freeman Gans  
Moulton & Gans, P.C.  
33 Broad Street, Suite 1100  
Boston, MA 02109  
617/369-7979  
617/369-7980(Fax)

Eric J. Belfi  
Murray Frank & Sailer, LLP  
275 Madison Avenue, Suite 801  
New York, NY 10016  
212/682-1818  
212/682-1892(Fax)

Laurence D. Paskowitz  
Paskowitz & Associates  
271 Madison Avenue, 20th Floor  
New York, NY 10016  
212/685-0969  
212/685-2306(Fax)

Marc I. Gross  
Joseph Gentile  
Pomerantz Haudek Block Grossman & Gross  
LLP  
100 Park Avenue, 26th Floor  
New York, NY 10017-5516  
212/661-1100  
212/661-8665(Fax)

M. Clay Ragsdale IV  
Ragsdale & Frese LLC  
1929 Third Avenue North  
550 Farley Building  
Birmingham, AL 35253-0924  
205/251-4775  
205/251-4777(Fax)

Roy L. Jacobs  
Roy L. Jacobs Attorney At Law  
60 East 42nd Street, 46th Floor  
New York, NY 10165  
212/867-1156  
212/504-8343(Fax)

Andrew M. Schatz  
Jeffrey S. Nobel  
Nancy A. Kulesa  
Schatz & Nobel, P.C.  
One Corporate Center  
20 Church Street, Suite 1700  
Hartford, CT 06103  
860/493-6292  
860/493-6290(Fax)

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Marc A. Topaz  
Schiffirin & Barroway, LLP  
Three Bala Plaza East, Suite 400  
Bala Cynwyd, PA 19004  
610/667-7706  
610/667-7056(Fax)

Samuel P. Sporn  
Christopher Lometti  
Frank R. Schirripa  
Schoengold & Sporn, P.C.  
19 Fulton Street, Suite 406  
New York, NY 10038  
212/964-0046  
212/267-8137(Fax)

Ralph M. Stone  
Shalov Stone & Bonner LLP  
485 Seventh Avenue, Suite 1000  
New York, NY 10018  
212/239-4340  
212/239-4310(Fax)

Thomas G. Shapiro  
Theodore M. Hess-Mahan  
Shapiro Haber & Urmey, LLP  
75 State Street  
Boston, MA 02109  
617/439-3939  
617/439-0134(Fax)

Jules Brody  
Stull, Stull & Brody  
6 East 45th Street, 4th Floor  
New York, NY 10017  
212/687-7230  
212/490-2022(Fax)

Robert I. Harwood  
Samuel K. Rosen  
Wechsler Harwood LLP  
488 Madison Avenue, 8th Floor  
New York, NY 10022  
212/935-7400  
212/753-3630(Fax)

Joseph H. Weiss  
Jack I. Zwick  
Weiss & Yourman  
551 Fifth Avenue, Suite 1600  
New York, NY 10176  
212/682-3025  
212/682-3010(Fax)

Marian P. Rosner  
Michael A. Schwartz  
Renee L. Karalian  
Wolf Popper LLP  
845 Third Avenue  
New York, NY 10022  
212/759-4600  
212/486-2093(Fax)

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Eduard Korsinsky  
Zimmerman, Levi & Korsinsky, LLP  
39 Broadway, Suite 1440  
New York, NY 10006  
212/363-7500  
212/363-7171 (Fax)

Richard A. Speirs  
Shaye Fuchs  
Zwerling, Schachter & Zwerling, LLP  
767 Third Avenue  
New York, NY 10017-2023  
212/223-3900  
212/371-5969 (Fax)